

SAUL EWING

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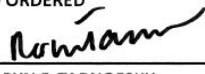
The Honorable Robyn F. Tarnofsky
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Application granted. To conserve resources, a stay of discovery is granted until September 24, 2024. The parties are to provide a joint update on the status but not the substance of their settlement talks within three business days of the settlement conference before Judge Wang.

Date: 08/30/2024

New York, NY

SO ORDERED


ROBYN F. TARNOFSKY
UNITED STATES MAGISTRATE JUDGE

RE: Zaziiz S. L. Dinkins v. Alejandro Mayorkas,
1:23-cv-10660-RFT

Dear Judge Tarnofsky:

We represent Plaintiff Zaziiz S. L. Dinkins as *pro bono* counsel for the limited purpose of conducting a settlement conference in the above-referenced matter. We, along with counsel for Defendant Alejandro Mayorkas, United States Secretary of Homeland Security, submit this update regarding the status of discovery pursuant to the Court's case management plan (*see* ECF No. 68) and, respectfully, request a brief stay of discovery in this matter pending settlement discussions.

First, notwithstanding the appearance of the undersigned as *pro bono* counsel for Plaintiff, the parties have engaged in limited discovery. On August 25, 2024, Plaintiff served Defendant with her answers to Defendant's interrogatories. Plaintiff has advised Defendant that she is in the process of collecting additional responsive documents and information and will produce them as soon as possible.

Second, on August 14, 2024, the parties appeared for a Pre-Settlement Conference Scheduling Call with Judge Ona T. Wang, and on September 4, 2024, the parties will be appearing for another Pre-Settlement Conference Call to formally schedule the settlement conference. After conferring, the parties believe that there is a realistic opportunity to resolve this matter at the settlement conference, which they intend to schedule for no later than September 24, 2024 (subject to Judge Wang's availability), and thus, they respectfully seek a stay of discovery pending completion of the settlement conference. The parties seek a stay of discovery to allow them to conserve their time and resources to focus on the submission of mediation statements and to prepare for the settlement conference. The parties are prepared to submit an update to the Court promptly upon the completion of the settlement conference to advise as to whether the matter has been resolved.

August 30, 2024

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We thank the Court for its attention to this matter and consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Ryan M. Jerome". The signature is fluid and cursive, with the first name "Ryan" being more prominent.

Ryan M. Jerome

cc: All Counsel of Record (via ECF)